

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:20-CR-228
	:	
	:	
Plaintiff,	:	JUDGE BENITA Y. PEARSON
	:	
-vs-	:	
	:	
WAYNE NORRIS,	:	<u>DEFENDANT'S UNOPPOSED MOTION</u>
	:	<u>FOR RELEASE ON BOND</u>
Defendant.	:	

Defendant, through counsel, moves this Court for release on unsecured bond with conditions of house arrest and location monitoring pursuant to 18 U.S.C. § 3142(b). Assistant United States Attorney Kevin P. Pierce has indicated the government does not oppose this Motion.

On March 11, 2020, Wayne Norris was charged in a two count Indictment with possession with the intent to distribute. (R. 3: Indictment). On April 7, 2020, Mr. Norris was detained pending resolution of this case. (R. 14: Waiver of Detention Hearing and Order). After reviewing discovery and engaging in negotiations with the government, Mr. Norris filed a Notice of Intent to Plea on April 29, 2020. (R. 29: Notice of Intent to Plea).

Pursuant to 18 U.S.C. § 3142(b), a defendant shall be ordered released unless such release will not reasonably ensure the appearance of the person or will endanger the safety of the community. Mr. Norris and undersigned counsel have engaged in plea negotiations, and a plea agreement has been reached. Mr. Norris has affirmatively indicated he is accepting responsibility for his conduct in the instant case, acknowledging his wrongful conduct and resulting punishment. Under the circumstances of this case, these negotiations and this plea agreement establish that Mr.

Norris's release under strict conditions will reasonably ensure his appearance and will not endanger the community. Based upon these negotiations and the plea agreement, the government does not oppose Mr. Norris's release on bond with strict conditions, specifically, house arrest with electronic monitoring.

For these reasons, Mr. Norris requests that the Court grant him bond with conditions of house arrest and location monitoring.

Respectfully submitted,

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